

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHRISTOPHER NOEL, SIMI LINTON, UNITED
SPINAL, a nonprofit organization, THE TAXIS FOR ALL
CAMPAIGN, a nonprofit organization, 504
DEMOCRATIC CLUB, a nonprofit organization,
DISABLED IN ACTION, a non profit organization,

Plaintiffs,

-against-

NEW YORK CITY TAXI AND LIMOUSINE
COMMISSION, a charter mandated agency, and DAVID
YASSKY, in his official capacity as chairman and
commissioner of the New York City Taxi and Limousine
Commission,

Defendants.
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**NOTICE OF CROSS-
MOTION FOR
SUMMARY
JUDGMENT**


11 Civ. 0237 (GBD)

PLEASE TAKE NOTICE that, that upon the annexed declaration of Ashwini Chhabra dated September 23, 2011, defendants' Statement Pursuant to Local Civil Rule 56.1 dated September 23, 2011, and defendants' Memorandum of Law in Support of their Cross-Motion for Summary Judgment and in Opposition to Plaintiffs' Motion for Partial Summary Judgment, dated September 23, 2011, and upon all prior papers and proceedings herein, the undersigned will cross-move this Court before the Honorable George B. Daniels at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an order granting summary judgment to defendants pursuant to Rule 56 of the Federal Rules of Civil Procedure, together with such other and further relief as the Court deems just, fair and equitable.

Dated: New York, New York
September 23, 2011

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